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COFFMAN/CUNNINGHAM SAMPLING AND ANALYSIS PLAN October 13, 1988

In general, the plan, which consists of one page, does not provide sufficient detail to allow for evaluation of the proposal. A revised plan must be submitted which addresses the following comments.

- 1. A revised plan must be submitted which includes:
- (a.) A facility map, which is either to scale or which includes dimensions, indicating as accurately as possible the proposed sample collection sites;
- (b.) A detailed description of the areas including the type and thickness of base construction such as asphalt, concrete, gravel, dirt, etc.
- 2. The plan must be revised to include justification for the selection of the proposed sampling locations.
- 3. The plan must be revised to include the specific methodology to be used in obtaining the soil samples.
- 4. The plan must be revised to specify the techniques of sample preservation to be used in the field. The EPA Publication "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, requires that samples containing volatile organics in a soil matrix be preserved at four degrees Celsius.
- 5. The plan must be revised to specify that the holding times specified in the EPA Publication SW-846 will be met. For volatile organics in a soil matrix, the holding time should not exceed fourteen days.
- 6. The plan must be revised to specify the type of sample container to be used.
- 7. The plan must be revised to include a more complete and site-specific description of the procedures which will be used to decontaminate the sampling equipment between soil borings.
- 8. The plan must be revised to include a requirement that non-foaming surfactants will be used in decontamination activities. The use of foaming agents can result in an unacceptably significant increase in the quantitation limit during subsequent laboratory analysis.
- 9. The plan must be revised to include a sample chain-of-custody form.
- 10. The plan must be revised to include a schedule of sampling activities including an estimated delivery date for the final report.

R00127716

R00127716 RCRA RECORDS CENTER

Beth/Harriett

MEMORANDUM

SUBJECT: Coffman/Cunningham Sampling and Analysis Plan

FROM: Harry Gabbert

Geologist, IOWA

TO: Facility File

THRU: Luetta Flournoy

Chief, IOWA

As requested I have reviewed the Sampling and Anaylsis Plan submitted by Coffman/Cunningham and received by the Iowa Section October 5,3 1988. The plan addresses soil sampling at the site in preparation of their closure plan.

In general the plan is too vague. No location map was given and the number of samples was not specified. At a minimum the following list of items must be addressed in detail;

- 1. A scaled facility map with proposed sampling locations delineated as accurately as possible must be submitted.
- 2. Justification for proposed sampling locations must be given.
- 3. Specific methodology to be used in obtaining soil samples must be given.
- 4. Preservation in the field and sample container type to be used must be specified.
- 5. Decontamination procedures for sampling equipment between borings needs to be more complete and site specific.
- 6. A sample chain-of-custody form must be submitted.

In addition to the specific items addressed above, a schedule of sampling activities including an estimated delivery date for the final report should be discussed.

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GABBERT KOESTERER JONES FLOURNOY

COFFMAN/CUNNINGHAM SAMPLING AND ANALYSIS PLAN

SAMPLING:

To be performed under the supervision of the Engineering Department of the City of Cedar Falls, Iowa Mr. James Krieg, Department Head. Mr. Krieg and his two staff engineers are professional engineers with civil engineering background.

The engineer will assure that samples are taken from each site pursuant to the enclosed sketches. Samples will be to a depth of two feet taken by methods directed by the engineer at each site, drilling and split spoon or equivalent methods to assure sampling integrity. Equipment will be soap and water sanctionized between samples. Each site is level with no significant drainage and accordingly the sample sites are designed to assure site coverage.

The samples will be placed in clean numbered containers provided by the lab. Each sample will be designated in accordance with site location and sample number (e.g. Big Woods #1) which correspond to the site plan.

Location assurance will be two-fold. Photographs of the sampling process will be taken for comparison to those taken by the EPA Field Representation. Invitation to attend and observe will be extended to the EPA, by date and time.

Custody of samples will be in the Engineer from the site until same day physical delivery to the lab.

The engineer will certify the sampling procedure and custody.

ANALYSIS:

The analysis of samples will be accomplished by the National Environmental Testing, Inc., 1922 Main Street, P.O. Box 625, Cedar Falls, Iowa 50613. The lab will perform a total metals test on each sample and test for the presence of volatile organic compounds (thinner). Procedures used shall follow those outlined in test methods for evaluating solid waste.

EPA Publication SW-846, 3rd Edition. The lab will certify receipt of custody of the samples from the city engineer and test results.

The analysis will be performed by Senior Chemist, David Hovick.

Estimate of costs for implementation of the sampling plan and analysis, and preparation of closure plan is \$3,000.00.

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